



MONTANA
TELECOMMUNICATIONS
ASSOCIATION



May 4, 2011

Marlene Dortch, Secretary
Federal Communications Commission
334 12th Street, SW
Washington, D.C.

In the Matter of

Schools and Libraries Universal Service
Support Mechanism

CC Docket No. 02-6

Dear Ms. Dortch,

On April 28, 2011, Ms. Betty Buckley, Executive Vice President of the Washington Independent Telecommunications Association (WITA) and Geoff Feiss, General Manager of the Montana Telecommunications Association (MTA) met with Rebekah Bina and Gina Spade of the Telecommunications Access Policy Division and Diane Holland and Paula Silberthau of the Office of General Counsel.

Mr. Feiss described widespread concern among schools, libraries and service providers relating to the gift ban provisions in the Commission's 6th Report and Order. The Order effectively has put a stop to any charitable contributions by service providers, or even potential service providers—regardless of their relationship with any schools or libraries—and schools and libraries. This unfortunate consequence is most pronounced in rural communities, where a longstanding charitable relationship exists between service providers and the schools and libraries in their rural communities. In Montana, the situation is exacerbated by state statute which requires cooperatives to donate unclaimed capital credits for educational purposes. The most relevant and effective contributions are for services or technology related to distance education, both because distance learning can enhance education quality and increase efficiencies of rural schools and because rural schools rarely can afford distance learning technology. However, the gift ban has put a stop to such constructive contribution practices.

Respectfully submitted,

/s/

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/s/

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